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January 16, 2016

Mr. Gary Miller  
Remedial Project Manager  
San Jacinto Waste Pits  
Superfund Division  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202

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16 JAN 22 AM 10:30  
SUPERFUND DIV.  
REMEDIAL BRANCH  
(6SF-N)

Dear Mr. Miller,

This letter is submitted on behalf of the Houston Regional Group of the Sierra Club (Sierra Club) regarding the December 23, 2015 "Site Update" about the San Jacinto Waste Pits Superfund Site (SJWPSS).

The Sierra Club is very concerned that a 25 foot by 22 foot "hole" was found by the U.S. Environmental Protection Agency (EPA) in the supposedly "protective cap" that is part of the SJWPSS. This is particularly disturbing because the "hole" was found underwater where no one could easily detect it. This "hole" incident, along with a previous incident where very soon after the cap was constructed a large number of rip-rap rocks, that covered on top of the cap, were washed away, emphasizes again the Sierra Club's grave concern about the adequacy of "a keep it covered containment cap alternative" versus a "complete removal alternative" which completely removes, treats, and disposes of the waste from the SJWPSS off-site.

The Sierra Club requests that EPA provide it with answers to the following questions:

- 1) Why was EPA unable to find the "hole" when it made a survey of the cap in October 2015?
- 2) What will be done in the future to ensure that EPA can find any "holes" in the cap when it makes a survey?
- 3) How deep was the "hole" in the cap?

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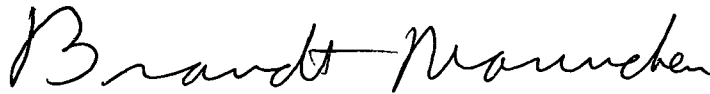


- 4) In the future, how often will EPA survey the cap to determine its complete integrity?
- 5) About how much soil and or waste was washed away from the cap?
- 6) Approximately when was the "hole" in the cap made?
- 7) How and what caused the "hole" in the cap (best determination) and what physical mechanism or mechanisms created the "hole"?
- 8) What remedial action was made to repair the "hole" in the cap?
- 9) How effective will the remedial action be to maintain the complete integrity of the cap?

The Galveston Bay Estuary, all its organisms, and people that live or play on this estuary is potentially exposed to dibenzodioxins/dibenzofurans due to the SJWPSS. It is of the utmost importance that the SJWPSS be completely cleaned up. A half-way job is not acceptable. Saving money is not an adequate excuse. The responsible parties have the money to clean-up the entire SJWPSS. No one 20 to 50 years from now must finish our clean-up job, the job we did not right the first time. The Sierra Club urges EPA to choose Alternative 6N, with appropriate mitigation measures and with a 50 parts per trillion target concentration or lower, and completely remove, treat, and dispose of the waste from the SJWPSS off-site.

The Sierra Club looks forward to hearing from EPA in the near future regarding our concerns and questions. Thank you.

Sincerely,



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